

ATTACHMENT “B”-STATEMENT OF BASIS

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT PERMIT NO. F-02-003

Diversified Composite (previously named DFI Pultruded Composites)
1600 DOLWICK DRIVE, ERLANGER, KENTUCY

FEBRUARY 7, 2002

FROUGH SHERWANI, REVIEWER

PLANT I.D. # 021-015-00118

APPLICATION LOG # 54319

SOURCE DESCRIPTION:

The Diversified Composite (previously named DFI Pultruded Composites, Inc.) is located at Erlanger, Kentucky, manufactures reinforced fiberglass products (RFP) through a process of pultrusion.

The source is currently classified as “No Permit Required”. The source has applied for conditional major under 401 KAR 52: 030, federally-enforceable permits.

Group Number: 01(EP1) Laboratory and General Exhaust System

This point is for laboratory and general exhaust system. This is an insignificant activity.

Group Number: 02(EP2) Pultrusion Process

Process Number: MP1 (MP1) Pultrusion Machine # 01

This point is for pultrusion machines. The “PTE” is based on 17.70 lbs. per hour resin.

Process Number: MP1 (MP2) Pultrusion Machine # 02

This point is for pultrusion machines. The “PTE” is based on 104.17 lbs. per hour resin

Process Number: MP3 (MP6) Pultrusion Machine # 06

This point is for pultrusion machine. The “PTE” is based on 6.25 lbs. per hour resin.

Group Number: 03(EP3) Pultrusion Process

Process Number: MP1 (MP3) Pultrusion Machine # 03

This point is for pultrusion machines. The “PTE” is based on 4.17 lbs. perhour of resin.

Process Number: MP2 (MP4) Pultrusion Machine # 04

This point is for pultrusion machines. The “PTE” is based on 58.33 lbs. per hour resin.

Process Number MP3 (MP5) Pultrusion Machine # 05

This point is for pultrusion machines. The “PTE” is based on 52.083 lbs. per hour resin.

Process Number MP4 (MP7) Pultrusion Machine # 07

This point is for pultrusion machines. The “PTE” is based on 9.583 lbs. per hour resin.

Group Number: 04 Resin Storage Area

This point is for resin storage. This is an insignificant activity.

Group Number: 05 Cut-Off Saw

This point refers to the particulate matter in the form resin dust caused by Cut-off saw that size the cured fiber rod into dimensionally finished length. This is an insignificant activity.

COMMENTS:

Type of control and efficiency:

Emission point 05 has a bag house to control particulate matter. The efficiency of the baghouse is 99%.

Emission factors and their source:

AP-42, 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

Applicable Regulations:

State regulation 401 KAR 59:010, New process operations, applies to these emissions points because these are process operations that were commenced after July 2, 1975.

State regulation 401 KAR 52:030 Federally-enforceable permits for non-major sources.

EMISSION AND OPERATING CAPS DESCRIPTION:

The actual emissions of HAPS for a single pollutant shall not exceed 9.0 tons per year. The combined emissions for HAPs shall not exceed 22.5 tons per year. The actual VOC emissions shall not exceed 90.0 tons per year. These annual limitations shall not be exceeded during any consecutive twelve months period for the entire source.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.